

**Federal Defenders
OF NEW YORK, INC.**

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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

December 10, 2021

By ECF

Honorable Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Kamel Osborne*, 19 Cr. 931 (VEC)

Dear Judge Caproni:

I write to respectfully request that the Court advance Kamel Osborne's voluntary surrender date from September 27, 2022 to January 20, 2022.

On February 4, 2021, Judge William H. Pauley, III sentenced Mr. Osborne to 24 months' incarceration and set a voluntary surrender date of August 25, 2021. The case was reassigned to Your Honor on August 13, 2021. On August 19, 2021, we requested that the Court postpone Mr. Osborne's surrender date to a date in January 2022, to allow him additional time to work. ECF No. 123. In response, the Court postponed Mr. Osborne's surrender to September 27, 2022. ECF No. 124.

Mr. Osborne is grateful for the Court's trust and its willingness to provide him with additional time before he serves his sentence. At this point, however, he is eager to serve the time and move forward. Accordingly, he asks that the Court advance his surrender date to January 20, 2022. As previously ordered, we ask permission for Pretrial Services to remove Mr. Osborne's ankle bracelet one day before his surrender.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Ariel Werner
Ariel Werner
Assistant Federal Defender
917-751-2050

cc: Rebecca Dell, Assistant U.S. Attorney

Application GRANTED.

Mr. Osborne must surrender on **January 20, 2022.**

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: December 10, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE